

Application No.: 10/052,356

Docket No.: 22197-00009-US

**REMARKS**

Claims 1 and 3-16 are pending. Claim 2 is canceled. Claims 1, 12 and 13 are amended.

**Claim Amendments**

Claims 1 and 13 are amended to positively recite that the layer on the inside of the housing is in sealing engagement with an outside of a pipe. This language is supported, for example, in previous claims 1 and 13, which stated that the inside of the housing was "adapted to form a seal" with an outside of a pipe. Claim 13 is further amended to recite that the second material is deformable, as recited in the other independent claims. Claim 12 is amended to correct the spelling of "molded." No new matter has been added.

**Claim Rejections - 35 U.S.C. §102**

Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 1, 3-5, 7-10 and 13 under 35 U.S.C. §102(b) as being anticipated by Chambers et al. (USP 5,406,983).

The independent claims (claims 1, 11, 12 and 13) define a coupling having a housing, retaining means and a layer of deformable material molded onto part of both the inner and outer surfaces such that the inner layer forms a seal with the outside of a pipe. The claimed coupling is advantageous because the coupling is easy to manufacture and is easy to use, as the inner layer forms an effective seal with an outer surface of an inserted pipe while the retaining means holds the pipe in the coupling.

The Chambers coupling differs greatly from the claimed coupling. The Chambers coupling is specifically designed for providing a corrosion-resistant coupling for externally threaded tubes. The coupling comprises a stress-bearing sleeve and a threaded shell of rigid composite material such as glass fiber or woven steel-reinforced resin. The composite shell cannot be compared to the deformable material recited in the present claims. Tubes are held in the Chambers coupling by screwing them into the coupling to engage the integral thread of the

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shell. The thread would not function if it were deformable like the deformable material recited in the present claims. The threaded shell could not retain a corrugated tube, either, since the helical thread and the circumferential grooves of the pipe would not engage, let alone form a seal as required by the claimed deformable material. Furthermore, none of the embodiments of Chambers show the shell extending over the stress-bearing sleeve. Thus, Chambers does not teach a housing of rigid/hard plastics, nor does Chambers teach or suggest the use of a deformable material that is molded over inner and outer surfaces of the housing wherein the inner layer forms a seal with a pipe, as recited in the claims at issue. For at least these reasons, claims 1, 3-5, 7-10 and 13 are allowable over Chambers.

Claim Rejections - 35 U.S.C. §103

Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 1 and 3-16 under 35 U.S.C. §103(a) as being unpatentable over Petty et al. (USP 4,923,227) in view of Chambers et al.

Petty shows a pipe coupling comprising a body having locking members and a tapering inner surface that terminates at a shoulder. Petty briefly suggests, but does not show, that a resilient seal could be provided adjacent to the shoulder to seal against the end of the inserted pipe. This disclosure is far from what is recited in claims 1 and 3-16, which state that the deformable material extends over both the inner and outer surfaces of the housing. As previously argued, this feature provides effective sealing while providing a gripping area for a user. Thus, the asserted combination of Petty and Chambers does not teach the claimed coupling in which a deformable material extends over inner and outer surfaces of the housing.

Furthermore, Applicant submits that one skilled in the art would not contemplate combining the Petty disclosure with the Chambers disclosure. Although both disclosures concern means for connecting tubular members, they relate to significantly different fields that have significantly different coupling requirements. The coupling of Petty is designed for domestic cabling or drainage, while the coupling of Chambers is corrosion-resistant and is adapted to operate in oil wells or other high-temperature, high-pressure environments. One

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skilled in the coupling art would be unlikely to consider combining these two disclosures to arrive at the claimed coupling.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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